

EXHIBIT 2

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF MISSOURI
3 CENTRAL DIVISION

4
5 MARY HOLMES, L.V. and EMPOWER
6 MISSOURI,
7 Plaintiffs,

8 vs.

9 ROBERT KNODELL, in his Case No.
10 official capacity as Acting 2:22-cv-04026-MDH
11 Director of the Missouri
12 Department of Social
13 Services,
14 Defendant.

15

16

17 *** CONFIDENTIAL ***

18

19 ZOOM VIDEOCONFERENCE DEPOSITION OF MELISSA
20 WOLF, a 30(b)(6) Witness, taken on behalf of the
21 Defendant before Laurel A. Woodbridge, Missouri CCR
22 No. 898 and Kansas CCR No. 1327, RPR, CSR, and CRR,
23 pursuant to Notice to Take Deposition on the 11th of
24 May 2023.

25

1 prepare for today's deposition?

2 A. Yes.

3 Q. Were those documents provided to you
4 by counsel?

5 A. The documents I reviewed were what
6 were submitted for -- excuse me -- in discovery.

7 Q. Okay. Thank you. Okay. All right.

8 MS. DEABLER-MEADOWS: I'm going to
9 introduce our second exhibit. This will be
10 DSS_Wolf 2.

11 And, Sara, this is going to be 45780.

12 (Whereupon, Deposition Exhibit DSS_Wolf
13 Number 2 was marked for identification.)

14 BY MS. DEABLER-MEADOWS:

15 Q. And just let me know when you can see
16 that document.

17 MR. HAYNES: It's in there.

18 A. Yes, I can see it.

19 BY MS. DEABLER-MEADOWS:

20 Q. Okay. We're going to have to zoom in
21 quite a bit to actually be able to read this, and
22 it's still a little bit hard to read. This is the
23 form it was produced to us in so we're -- we're just
24 going to have to do our best.

25 Okay. So let's start with what is a

1 resource center?

2 A. A resource center would -- is a
3 physical location where the Family Support Division
4 has staff that can assist participants or applicants.

5 Q. And is that participants or applicants
6 in SNAP?

7 A. It's in any program.

8 Q. Okay. And what is a customer service
9 center?

10 A. A customer service center is typically
11 called -- or referred to as a call center where
12 applicants and participants can call to conduct any
13 business that is needed.

14 Q. Okay. And are those -- are there
15 multiple locations of customer service centers?

16 A. Yes, there is.

17 Q. And are those -- are they separate
18 offices from resource centers?

19 A. In some instances, yes. Other times,
20 they are co-located.

21 Q. Okay. And what's a processing center?

22 A. A processing center would include
23 offices where the cases are either processed, whether
24 that includes adding verification that is received
25 and processes the case whether -- to the outcome that

1 is determined.

2 Q. Okay. Is it correct that processing
3 centers are not open to the public?

4 A. That is correct.

5 Q. Okay. And are those in separate
6 locations from resource centers and customer service
7 centers?

8 A. Again, in some instances, yes; in
9 others, no.

10 Q. Okay. And those three different types
11 of offices -- resource centers, customer service
12 centers, and processing centers -- do they have
13 distinct staffs?

14 A. There are staff that are assigned to
15 each one: Processing, customer service or resource
16 center.

17 Q. Okay. And are the frontline staff who
18 work in those three different kinds of offices, are
19 their jobs -- are the job descriptions different for
20 each of those three types of offices?

21 MR. HAYNES: I'm going to go ahead and
22 object to the question. I think it's a little vague
23 as to what you mean by "frontline" in this instance.

24 But if you understand the question,
25 please go ahead and answer.

1 A. I'm not a hundred percent sure. I was
2 going to ask for clarification.

3 BY MS. DEABLER-MEADOWS:

4 Q. Of course. Okay. So for staff who
5 work in resource centers, customer service centers,
6 and processing centers, when you a hire a staff for
7 those three different locations -- or three different
8 types of offices, are those different positions?

9 A. They are not different positions.
10 They are under the same position title.

11 Q. Okay. And when they're hired, do they
12 all receive the same training?

13 A. Yes.

14 Q. Okay. Is there any additional
15 specialization between those three types of offices
16 once staff are hired?

17 A. Can you clarify the question slightly,
18 please?

19 Q. Sure. So once a resource center staff
20 person is hired and trained, would they need to have
21 any additional training if they were to be
22 transferred to a customer service center?

23 A. Other than possibly the system -- the
24 phone system, no, there would be no additional
25 training.

1 Q. Okay. And is that the same for the
2 processing center?

3 A. That is correct.

4 Q. Okay. Thank you. Do staff who work
5 in these three different types of offices have
6 different supervisors?

7 A. Can you restate the question, please?

8 Q. Sure. Let me try it a different way.

9 A. Okay.

10 Q. Within the organization of FSD, do
11 resource centers, customer service centers, and
12 processing centers have the same leadership?

13 MR. HAYNES: Object as a bit vague as
14 to exactly what you mean by "leadership."

15 But if you understand the question,
16 please go ahead and answer.

17 A. I do not understand the question. I'm
18 sorry.

19 BY MS. DEABLER-MEADOWS:

20 Q. I'll come back to it once we start
21 looking at the org chart. That might make it a
22 little bit more clear.

23 Okay. So can staff be reassigned from
24 working in a resource center to working in a customer
25 service center?

1 the last one should be download just for that file.

2 MR. HAYNES: Okay. Thank you. That's
3 what I was going to ask if you had a way to do that
4 individually. Unfortunately, following along with
5 you, I had to go back and so I'm out of the exhibit
6 now. But go ahead and ask your question. I think I
7 saw what you were talking about.

8 BY MS. DEABLER-MEADOWS:

9 Q. Okay. Are you able to see Notes on
10 Measures Number 3 in the January 2023 tab?

11 A. Hang on just one second. It caused me
12 problems again so....

13 MR. HAYNES: Okay. Let's download it
14 and we'll -- oh, are you back in?

15 THE WITNESS: I think I'm back in.
16 I'm sorry.

17 MR. HAYNES: You are on the January
18 2023 file; right?

19 THE WITNESS: Yes. Yes, I am in Notes
20 for January of '23. Thank you.

21 BY MS. DEABLER-MEADOWS:

22 Q. Okay. Great. Okay. So we're looking
23 at Number 3. It says, "Average call completion time
24 in minutes: 'Completion time' means the full
25 duration of time the client spends on the call,

1 beginning when the client enters the call center
2 queue until the interview is completed."

3 What does it mean for a client to
4 enter the call center queue?

5 A. Entering the queue would mean they
6 have gone through the appropriate IVR and are in the
7 queue specific to what -- whether it be the SNAP
8 interview queue or a general information queue and
9 waiting for their call to be answered.

10 Q. Okay. Thank you. And we're also
11 going to look at Number 1 which reads, "Average call
12 wait time for interview: Do not include abandoned
13 and dropped calls. 'Wait time' ends when the
14 eligibility worker answers the call to begin the
15 interview."

16 When does the count begin for wait
17 time? That was bad. Let me rephrase that. Strike
18 that.

19 Does wait time include the time that
20 it takes a client to answer IVR questions?

21 A. It does not.

22 Q. And just so we're clear on the
23 transcript, IVR is interactive voice response;
24 correct?

25 A. That is correct.

1 Q. Okay. So we're going to go up to the
2 actual numbers on the spreadsheet and we're going to
3 look at Number 4, the "Number of dropped calls."

4 Do you see where I'm referring?

5 A. Yes.

6 Q. So I see on the Notes on Measures, it
7 says that the "number of dropped calls: includes all
8 calls disconnected due to call center error, lack of
9 call center capacity, etc. Do not include abandoned
10 calls, during which the client terminates the call
11 before completion."

12 So what does "lack of call center
13 capacity" mean within that definition?

14 A. This is a form -- this is FNS, or Food
15 Nutrition Services, template and form, so I would be
16 making an assumption of what their definition means.
17 But "call center capacity" would be lack of staff --
18 lacking of staff to answer the call.

19 Q. Okay. So then Line Number 4, "Number
20 of dropped calls," it says zero. Does that indicate
21 that there were zero calls that were disconnected for
22 the reasons listed in the Notes on Measures Number 4
23 definition?

24 A. Yes.

25 Q. Okay. We're going to go to our next

1 We'll go back on the record. Can you hear me now?

2 MR. HAYNES: I heard a whisper there.

3 MS. DEABLER-MEADOWS: Can you hear me?

4 THE WITNESS: Oh, yes, I can hear you
5 now. Sorry about that.

6 MR. HAYNES: We're back on.

7 MS. DEABLER-MEADOWS: So we're back on
8 the record.

9 BY MS. DEABLER-MEADOWS:

10 Q. So the customer service centers that
11 we talked about earlier, are they also referred to as
12 call centers?

13 A. Yes, that is correct.

14 Q. Okay. And does the call center have
15 multiple tiers?

16 A. They do.

17 Q. And what are those tiers?

18 A. Currently we have two tiers. One is
19 general questions or case information for all
20 programs, and then we have a tier specifically
21 designated for SNAP interviews.

22 Q. Okay. And is the general information
23 tier referred to internally as Tier 1?

24 A. Yes.

25 Q. And is the interview tier referred to

1 internally as Tier 3?

2 A. Yes.

3 Q. Is that just a holdover from a time
4 when there were more than two tiers?

5 A. Yes.

6 Q. Okay.

7 MS. DEABLER-MEADOWS: Sara, we're
8 going to look at 100669, which will be DSS_Wolf
9 Exhibit 17 -- or, sorry, 18. DSS_Wolf 18.

10 (Whereupon, Deposition Exhibit DSS_Wolf
11 Number 18 was marked for identification.)

12 BY MS. DEABLER-MEADOWS:

13 Q. Let me know when you can see that.

14 A. I have it.

15 Q. Okay. Do you recognize this document?

16 A. Yes.

17 Q. And what is this document?

18 A. This is a chart regarding call center
19 statistics or calls -- specifically Tier 1 right
20 there at the top. And it looks like this is Tier 1
21 as I scroll down through. I'm sorry. I hadn't
22 scrolled through the entire thing.

23 Q. That's fine.

24 A. It does include Tier 3, it appears.

25 Q. And we're going to at the moment look

1 specifically at the 11th and 12th pages of this
2 document. The Bate Stamp on the 11th page is 100679.
3 Let me know when you're there.

4 A. Did you say 679?

5 Q. Yes.

6 A. Okay. I'm sorry. It took me a minute
7 to get there. Okay. I am on Page 11.

8 Q. Okay. So right now we're going to
9 look at the material that starts with the bullet that
10 says "2016." Do you see where I'm referring?

11 A. Yes, I see it.

12 Q. Okay. And does the material following
13 this bullet and carrying on to the next page, is this
14 a summary of changes to the tier structure in the
15 call center over the course of the past several
16 years?

17 A. Yes.

18 Q. Do callers have to call different
19 phone numbers to access different tiers?

20 A. No.

21 Q. How -- how do callers access the
22 different tiers?

23 A. In the -- when proceeding through the
24 IVR, there are questions that help direct the call to
25 the correct tier.

1 take a caller to Tier 1 directly?

2 A. Yes, we have two numbers that lead
3 into our customer service center.

4 Q. Okay. And one is for Tier 1 and one
5 is for Tier 3; is that correct?

6 A. Correct. But note that they can go to
7 either tier with either phone number, based on the
8 need.

9 Q. Okay. Thank you.

10 Okay. And then we're going to look at
11 the bullet that refers to July 3, 2020. Do you see
12 where I'm referring?

13 A. Yes.

14 Q. This bullet refers to a predictive
15 dialer. What's a predictive dialer?

16 A. The predictive dialer is where
17 outbound calls are made to applicants who have
18 applied, provided a phone number, the predictive
19 dialer calls that phone number that is submitted by
20 the applicant to complete the interview and is
21 usually done the business day after the applicant has
22 applied.

23 Q. We're going to look at the next bullet
24 down that refers to October 6, 2020. Do you see
25 where I'm referring?

1 A. Yes.

2 Q. This refers to Tier 3 Outbound. What
3 is Tier 3 Outbound?

4 A. That would be also called a predictive
5 dialer.

6 Q. Okay. And does Tier 3, standing on
7 its own without the word "outbound," does that refer
8 to inbound calls to Tier 3?

9 A. Tier 3 can be inbound and outbound
10 calls.

11 Q. Okay. So this insert indicates that
12 prior to October 6, 2020, predictive dialer calls
13 were always prioritized over inbound calls. Am I
14 reading that correctly?

15 A. Yes.

16 Q. It indicates that on October 6th, this
17 was changed so that outbound still had priority but
18 only when the inbound wait time was less than
19 45 minutes. Am I reading that correctly?

20 A. Yes.

21 Q. And then if we look at the next bullet
22 on October 9th, it looks like the priority was
23 changed back so that outbound always had priority
24 again; is that correct?

25 A. Yes.

1 Q. Why was this series of changes made?

2 A. Changes are often made at the call
3 center and the -- or the customer service center to
4 improve efficiency for applicants and to improve the
5 customer experience in completing the interview.

6 Q. Okay. Was there a specific reason why
7 these changes were made in particular?

8 A. These changes were made in an attempt
9 to improve efficiency and effectiveness of the SNAP
10 interview tier.

11 Q. Were the changes made in response to
12 any problems that were happening in the call center?

13 A. I can't speak specifically. This
14 would be -- this really is just to improve the -- you
15 know, the calls -- or the outbound calls versus the
16 inbound calls and trying to assist as many customers
17 as possible.

18 Q. Okay. And practically speaking, what
19 does it mean for outbound calls to be prioritized?

20 A. The predictive dialer, in a very
21 layman's, not technical term, they reach out -- the
22 predictive dialer reaches out based on the phone
23 number provided and applications that were submitted
24 yesterday or the previous business day, and so we
25 attempt to get through all of those the next business

1 day to complete the interview as quickly as possible.

2 Q. Okay. And when outbound calls are
3 being prioritized, does that mean that all of the
4 workers in the call center at that time are handling
5 outbound calls only?

6 A. Can you restate your question, please?

7 Q. Sure. When outbound calls are
8 prioritized, does that mean that all workers on the
9 call center are handling those calls at the same
10 time?

11 A. No, out -- when outbound calls are
12 prioritized, it's those staff that are specifically
13 assigned to Tier 3 or for the SNAP interviews,
14 outbound calls are made the priority, not everyone on
15 the call center.

16 Q. Okay. When outbound calls are
17 being -- when Tier 3 outbound calls are being
18 prioritized, does that mean that all of the workers
19 working on Tier 3 are handling the outbound calls?

20 A. Yes.

21 Q. Okay. We're going to look at a bullet
22 that refers to August 18, 2021.

23 A. Did you say August 18th of '21?

24 Q. Yes, which is on Page 6 of this
25 document.

1 Q. Okay. Does "licenses" refer to the
2 number of Genesys licenses that DSS had at the time
3 this email was sent?

4 A. Yes.

5 Q. Okay. And what is Genesys?

6 A. Genesys is the phone system we use for
7 our customer service center.

8 Q. Okay. And is Genesys a cloud-based
9 system?

10 A. Yes, it is.

11 Q. Okay. So if DSS wanted to add
12 additional licenses, what would they do?

13 A. I believe there is a purchasing -- or
14 a request to purchase additional license, and that
15 would go through the normal process for any purchase
16 request through Social Services.

17 Q. Okay. Thank you. I believe you
18 already referred to Toni Sneller once today, but what
19 is -- what is Toni Sneller's job?

20 A. Toni Sneller's job is that she assists
21 with the customer service center. She's under
22 Nichole Conway, but she also leads the customer
23 experience team.

24 Q. Okay. And does the number of Genesys
25 licenses, does that act as an upper limit on how many

1 to be 0117095. So this will be DSS_Wolf 22.

2 (Whereupon, Deposition Exhibit DSS_Wolf

3 Number 22 was marked for identification.)

4 BY MS. DEABLER-MEADOWS:

5 Q. Let me know when you can see that.

6 A. I can see it.

7 Q. Okay. So this is another email that
8 was produced in discovery. It's another one that I
9 don't see you cc'd on, so if you want to take a
10 moment to read it, please do so.

11 A. Yes. If you'll allow me one minute.
12 Thank you. Okay.

13 Q. Okay. So in this email, Nichole
14 Conway states, "We have not worked out a plan yet for
15 how phones will factor into everyone's daily/weekly
16 assignments along with processing."

17 Is she referring there to processing
18 center staff working the phones?

19 A. Yes.

20 Q. Okay. Can a processing center staffer
21 working the phones, are they conducting interviews?

22 A. Yes.

23 Q. Was a plan worked out for how to
24 allocate processing center staff time in relation to
25 the call center?

1 A. Yes, it was.

2 Q. And what is that plan?

3 A. The plan now is processing center
4 staff spend usually -- approximately three to four
5 hours a day assisting with call center -- or customer
6 service center calls.

7 Q. Okay. And does the amount of time
8 that processing center staff spend on the phones
9 fluctuate based on call center demand?

10 A. Yes.

11 Q. Okay.

12 A. But I believe -- I believe there is a
13 minimum of time that processing center staff will
14 take -- will assist with phone calls.

15 Q. Okay. Great. And who makes the
16 decision to have processing center staff spend more
17 time on the phones?

18 A. That would be a decision made between
19 Jason Comer and Nichole Conway and potentially Kim
20 Evans.

21 Q. Okay. And is that a decision that's
22 made on like a daily basis?

23 A. It would depend on demand --

24 Q. Okay.

25 A. -- and the volume of calls.

1 via the call center?

2 A. I'd like to take some time to read it
3 because I --

4 Q. Sure. Go ahead.

5 A. Thank you. This is not the current as
6 we now have an appointment scheduler that is
7 available to applicants and participants for them to
8 make their -- for them to set their own appointment
9 that works best for them.

10 Q. Okay. Is that appointment scheduler,
11 is that like an automated system within the call
12 center?

13 A. It -- or online. It is both.

14 Q. Okay. So at the time this email was
15 written, did callers have to connect with a DSS
16 representative to be scheduled for an appointment?

17 A. Yes.

18 Q. But they no longer have to do that;
19 correct?

20 A. Correct.

21 Q. Okay. And can you use -- can --
22 scratch that.

23 Can staff, applicants and participants
24 use the appointment scheduler to schedule both
25 in-person and telephone appointments?

1 A. Yes.

2 Q. Are there any other ways that
3 applicants can make appointments?

4 THE WITNESS: Can you --

5 MR. HAYNES: I'm sorry. You cut out.

6 MS. DEABLER-MEADOWS: Oh, sorry. I
7 turned away from my microphone again.

8 BY MS. DEABLER-MEADOWS:

9 Q. Are there any other ways that SNAP
10 applicants or participants can make appointments?

11 A. SNAP applicants or participants can
12 walk into any of our resource centers and make an
13 appointment if that's what they wish to do.

14 Q. Okay. So appointments can be made in
15 person at a resource center or via the appointment
16 scheduler on the phone system or via the appointment
17 scheduler online; is that correct?

18 A. That's correct.

19 Q. Are there any other ways to make
20 appointments?

21 A. Not at this time.

22 Q. If a SNAP applicant schedules an
23 appointment to be interviewed, are they guaranteed to
24 get an interview slot that is prior to their 30-day
25 deadline to be interviewed?

1 Q. Sorry. I coughed.

2 A. Okay. It would be based on the
3 appointments that were scheduled and just for what
4 the individual -- the applicant or participant needed
5 to resolve.

6 Q. Okay. Does this appointment -- sorry.
7 Scratch that.

8 Does this spreadsheet pull data from
9 the appointment scheduler's system that we were
10 talking about a couple minutes ago?

11 A. I'm looking at the date, because this
12 may -- this appears to have been being used prior to
13 the appointment scheduler system we have now, so this
14 would be -- this would have been to bridge the gap
15 until we fully implemented our current appointment
16 scheduler.

17 Q. Okay. Is there a different tracking
18 document that's used now that the appointment
19 scheduler is implemented?

20 A. That current one was just implemented,
21 I want to say, March of this year.

22 Q. Okay. So are you-all tracking the
23 appointment requests and the outcomes anywhere now
24 that the appointment scheduler is implemented?

25 A. Yes, we would be tracking that.

1 are finished with this document if you want to close
2 out of the giant Excel spreadsheet.

3 MR. HAYNES: It's saved. Don't save
4 it again.

5 A. Okay. Perfect.

6 BY MS. DEABLER-MEADOWS:

7 Q. And before we introduce our next
8 document, I'm just going to return to the
9 interrogatory responses, which we had marked as
10 Exhibit 19. So let me know when you've navigated
11 back to that document.

12 A. Did you say DSS_Wolf 19?

13 Q. Yes.

14 A. Okay. I'm back.

15 Q. Great. When did the FSD call center
16 transition to Genesys?

17 A. I believe that was in '21. I want to
18 say -- I believe it was in '21. It was June of '21.

19 Q. Thank you. And is it correct that
20 outbound -- sorry. Scratch that.

21 Is it correct that inbound call center
22 calls were previously handled on a Cisco platform?

23 A. Yes, that is correct.

24 Q. Okay. And is it correct that
25 predictive dialer calls were previously handled on an

1 Acqueon platform?

2 A. Prior to Genesys?

3 Q. Yes.

4 A. I believe so, yes.

5 Q. Why did DFS switch to Genesys for
6 their call center operations?

7 A. Genesys provides a cloud-based
8 solution and better reporting.

9 Q. And what are the advantages as far as
10 DFS is concerned in using a cloud-based platform?

11 A. One advantage is the licenses and how
12 we can -- "we," as in Family Support Division -- can
13 ensure more workers across the state can take phone
14 calls.

15 Q. Okay. Did the previous platform
16 require that workers have specific phones?

17 A. Yes.

18 Q. And does Genesys require that people
19 have specific phones?

20 A. It does -- it does require certain --
21 it does require certain licenses and certain options,
22 but there is more flexibility with the Genesys
23 platform.

24 Q. Okay. And you said that Genesys
25 provides better reporting; is that correct?

1 A. Yes.

2 Q. What sort of reporting can Genesys
3 provide?

4 A. Cisco had limited reporting and so
5 Genesys offers more reporting specifically that can
6 be tailored to fit Social Services needs.

7 Q. Okay. Can you think of any specific
8 items that are tracked in Genesys that cannot be
9 tracked in Cisco?

10 A. I don't want to speak specifically to
11 that. I know it has better reporting, and I don't
12 want to misstate anything.

13 Q. Okay. Who would know the answer to
14 that?

15 A. Nichole Conway.

16 Q. Okay. Thank you.

17 Okay. We're going to look at the
18 bullet in the rog responses that starts with July 6,
19 2021. Let me know when you can see that.

20 A. July 6th of '21?

21 Q. Yes. That should be on the fifth page
22 of the document.

23 A. Okay.

24 Q. Okay. So this text says, "Because
25 Genesys has no limits on the queue size, the number

1 of people in queue often reaches 1,000 or more which
2 is more than staff can handle in one day. The IVR is
3 updated to only allow calls into the queue or into
4 callbacks if the estimated wait time + 2 hours is
5 less than the amount of hours left in the day."

6 Do you see where I'm referring?

7 A. Yes.

8 Q. Okay. Are calls that come in to the
9 call center when new calls are not being let into the
10 queue deflected?

11 A. Yes.

12 Q. What was the limit on the queue size
13 before Genesys was implemented?

14 A. I don't know that answer. I know it
15 was limited, though.

16 Q. Okay. Who would know the answer?

17 A. Nichole Conway.

18 Q. Prior to implementing Genesys, did DSS
19 have a plan of action for managing queue length and
20 wait times?

21 A. DSS always wants to work to improve
22 the effectiveness and efficiency of the program and
23 are always looking to improve how we handle calls and
24 process applications.

25 Q. Okay. As Genesys was implemented, did

1 DSS anticipate that there might be problems with
2 queue length?

3 A. DSS understands that any -- any
4 program may have some issues, but we work to resolve
5 those as soon as they are identified.

6 Q. Okay. Thank you. Is the capacity
7 limit described in this bullet, which is estimated
8 wait time plus two hours, is that still the capacity
9 limit in use on the call center today?

10 A. I believe it is, just to ensure we can
11 address everyone's needs as best we can.

12 Q. And what is -- how is the estimated
13 wait time calculated?

14 A. Estimated wait time is based on the
15 average time it takes to complete an interview
16 specifically for SNAP. This is -- I want to
17 rephrase. This is talking about Tier 3 when it comes
18 to SNAP interviews. Estimated wait time is looked at
19 based on the average time it takes to do an interview
20 plus the number of calls in the queue prior to
21 entering.

22 Q. Okay. Let's look at the bullet that
23 refers to December 10, 2021, which is towards the
24 bottom of the sixth page of the document. Let me
25 know when you're there.

1 does this IVR flow include the option to schedule an
2 appointment?

3 A. I have to review it. It does discuss
4 rescheduling or canceling appointments. I'm
5 continuing to review. It does talk about scheduling
6 an appointment.

7 Q. And where are you seeing that?

8 A. Towards the -- it's the next-to-last
9 page. It's at the very end. How does a person --
10 how does a person schedule an appointment?

11 Q. Okay. Okay. So does this text,
12 "Choose to schedule an appointment. Once caller is
13 in queue, caller will hear how many people are ahead
14 of them and offer to schedule an appointment instead
15 of waiting," is that how a -- how the appointment
16 scheduler is currently offered as an option?

17 A. Can you say that again. You cut out
18 just a little bit.

19 Q. Sure. Yep. There's text that says,
20 "Choose to schedule an appointment. Once caller is
21 in queue, caller will hear how many people are ahead
22 of them and offer to schedule an appointment instead
23 of waiting." Is that the place in the IVR flow where
24 callers are currently offered access to the
25 appointment scheduler?

1 A. I believe so, yes.

2 Q. Okay. Thank you.

3 MS. DEABLER-MEADOWS: We've just a
4 little bit more to talk about before we're totally
5 done with this topic and then we can break for lunch.

6 THE WITNESS: Okay.

7 MS. DEABLER-MEADOWS: Okay. So we're
8 going to look at another document.

9 Sara, it's going to be 0137397, and
10 this will be DSS_Wolf 34.

11 (Whereupon, Deposition Exhibit DSS_Wolf
12 Number 34 was marked for identification.)

13 BY MS. DEABLER-MEADOWS:

14 Q. Let me know when you can see that.

15 A. Mine opened.

16 Q. Okay. Do you recognize this document?

17 A. Yes, I've seen this document.

18 Q. And what is this document?

19 A. Excuse me. This appears to be another
20 flow on the IVR for the call -- customer service
21 center regarding -- there is some information here
22 regarding the predictive dialer.

23 Q. Okay. So is this the predictive
24 dialer IVR flow?

25 A. Yes.

1 Q. Is this the current version of this
2 document?

3 A. I believe so, yes.

4 Q. If a client answers the predictive
5 dialer call and they select Option 1, are they placed
6 in the same queue as individuals who are calling in
7 themselves to complete their staff interview?

8 A. No.

9 Q. Are they placed in a different queue?

10 A. They are directly connected to an
11 eligibility worker to complete the interview.

12 Q. Okay. Is there any circumstance in
13 which an individual being called by the predictive
14 dialer would be placed in a queue?

15 A. Not that I'm aware of.

16 Q. Has there ever been a time when
17 callers called on the predictive dialer and were
18 placed in a queue?

19 A. No, they are connected directly to an
20 eligibility worker.

21 Q. We're going to look at the text at the
22 top of this document. It says, "Applications that
23 are screened as expedite will receive 1 call for two
24 days or until their interview is completed, whichever
25 occurs first. All other applications receive 1 call

1 for one day."

2 Do you see what I'm referring to?

3 A. Yes.

4 Q. What is "screened as expedite"?

5 A. "Screened as expedite" indicates that
6 they've met the expedited criteria for SNAP benefits.

7 Q. Okay. And how is that screening
8 conducted?

9 A. That screening is conducted on the
10 application. There is a box of questions on the very
11 first page that would indicate expedited benefits may
12 be needed.

13 Q. Okay. And how would someone who is
14 eligible for expedited SNAP benefits complete their
15 interview if they miss the two predictive dialer
16 calls that are referred to in this text?

17 A. Any participant or applicant can
18 complete their interview making -- scheduling an
19 appointment, walking into any resource center and
20 asking for that, and via the phone for the customer
21 service center.

22 Q. Are individuals who are screened as
23 expedite-eligible, are they given any sort of
24 priority over other SNAP interviews?

25 A. They are -- they receive more

1 predictive dialer calls. They receive the -- they
2 receive the call for two days, one call for two days
3 as a priority.

4 Q. Okay. Any other priority?

5 A. Not at this time.

6 Q. Okay. Thank you. So this text -- the
7 text on this page also says, "All other applications
8 receive 1 call for one day." Do you see what I'm
9 referring to?

10 A. Yes.

11 Q. Does that include both recertification
12 applications and initial applications?

13 A. Yes.

14 Q. Thank you. Okay. We're going to
15 quickly refer back to a prior exhibit. That's going
16 to be Exhibit 5, and we'll be looking at the third
17 page of document once you're in there.

18 A. Okay. I'm on the third page.

19 Q. Okay. All right. We're going to look
20 at a paragraph that's about halfway down the page.
21 It's just above the number 8, and it says, "DSS has
22 implemented predictive dialing for the call centers
23 which attempts contact with clients on the first day
24 for all applications. After attempts for four days,
25 the system will generate a Notice of Missed Interview

1 A. I believe we did verbally.

2 Q. Okay. And did FNS approve the change
3 in procedure?

4 A. We have not received anything from FNS
5 indicating they did not approve of it.

6 Q. Okay. So just to confirm, there was
7 no written notification to FNS of the change in
8 procedure?

9 A. That's correct.

10 Q. But you believe there was a verbal
11 notification?

12 A. Correct.

13 Q. Who made that verbal notification?

14 A. That would have been Alicia Mitchem.

15 Q. Okay. Thank you.

16 MS. DEABLER-MEADOWS: Okay. We're at
17 a good place to pause. So do we want to do 45
18 minutes again?

19 MR. HAYNES: We did 45 minutes
20 yesterday and that was good for us, but if you need
21 more time.

22 THE WITNESS: No, 45 minutes is fine.
23 Thank you.

24 MS. DEABLER-MEADOWS: Okay. Great.
25 So we will reconvene in 45 minutes, which will be

1 at -- somebody else do the math because I'm in a
2 different time zone.

3 MR. HAYNES: Is that 1:20-ish?

4 MS. DEABLER-MEADOWS: Sounds good.

5 All right. I will see you all in a while.

6 THE WITNESS: Thank you.

7 (Noon recess taken.)

8 MS. DEABLER-MEADOWS: We'll go back on
9 the record.

10 BY MS. DEABLER-MEADOWS:

11 Q. Did the resource centers close in
12 response to COVID-19?

13 A. Yes, resource centers did close in
14 response to the public health emergency and COVID-19.

15 Q. And when did they close?

16 A. End of March of 2020.

17 Q. And at this point, are they reopened
18 to the public?

19 A. Yes, they are reopened to the public
20 at this point.

21 Q. And when did they reopen?

22 A. Beginning in February of '21 we began
23 the reopening based on COVID cases or numbers in the
24 community, but also offering appointments only in
25 February of '21. But in May of '21, the governor

1 declared that all offices must reopen -- all state
2 offices must reopen to the public.

3 Q. Okay. And at that point, did all
4 resource centers return to normal hours of operation?

5 A. They did to the point that we had
6 staff available and could staff the resource center.

7 Q. Okay. And what are the typical hours
8 of operation for a resource center?

9 A. Resource centers are open Monday,
10 Tuesday, Thursday and Friday from 8:00 to 5:00 and on
11 Wednesdays 9:00 to 5:00. Just note that sometimes we
12 are co-located with other agencies and those hours
13 may not be the same as ours.

14 Q. Okay. And are the hours of operation
15 the same for every resource center?

16 A. Yes.

17 Q. Okay. Has that always been true?

18 A. Yes.

19 Q. So did I hear you correctly that
20 resource centers are not open to the public on
21 Wednesdays?

22 A. They are open to the public on
23 Wednesday. They do not open until 9:00 a.m. on
24 Wednesday mornings.

25 Q. Okay. Thank you.

1 resource centers that were open.

2 A. So what is the question, then?

3 Q. Does this paragraph, 99, and this
4 Footnote Number 10 accurately describe the days and
5 hours of operations for resource centers today?

6 A. As of today, we are expanding all --
7 you know, expanding opening as many as we can. The
8 goal is to be open five days a week in every
9 location, but we also have to ensure we have staff
10 that can work in those locations, and we are actively
11 pursuing and hiring in locations to ensure staff are
12 there to have the resource centers open five days a
13 week.

14 Q. Okay. So is it accurate to say that
15 not all resource centers are currently open five days
16 a week due to staffing issues?

17 A. That is correct.

18 Q. Okay. Is there a target date for
19 resolving those staffing issues?

20 A. DSS works towards opening those as
21 quickly as we can and are working through the hiring
22 process to ensure those locations can be open five
23 days a week.

24 Q. Who makes the decision as to how the
25 limited resource center staff is allocated amongst

1 Q. Okay.

2 A. -- if needed.

3 Q. Thank you. And is -- does Jason Comer
4 also decide how many staff are needed for a
5 particular resource center to be open five days a
6 week?

7 A. It's -- the staffing level is
8 determined by the demand and the traffic that
9 potentially will enter or, you know, need assistance
10 in that resource center. That decision is made in
11 coordination with our human resource department.

12 Q. Okay. How are the demand and the
13 traffic for a given resource center tracked?

14 A. We -- excuse me. DSS and FSD have a
15 tasking system that tracks each interaction with the
16 public or participants or applicants.

17 Q. And what's that tracking system
18 called?

19 A. It's called Kurent.

20 Q. If a SNAP applicant's local resource
21 center is functioning on limited hours due to
22 staffing problems, how can that applicant learn what
23 hours their local resource center is open?

24 A. On the DSS website, we have our
25 locations listed, our resource centers locations

1 listed, and those hours of operation are up-to-date.
2 Now, I will say it can't -- it may not have immediate
3 when bad weather occurs and we have to close a
4 resource center or a gas leak, some issues like that,
5 may not be updated immediately.

6 Q. Okay. How would an applicant who
7 doesn't have internet access learn that information?

8 A. It could also -- many of our resource
9 centers have their hours posted on their doors.

10 Q. Other than COVID-related closures and
11 reopening and the staffing issues that we just
12 discussed, have there been any other changes to the
13 hours of operation of resource centers since the
14 beginning of 2019?

15 A. Other than -- like, I said, COVID,
16 staffing issues or potentially bad weather or gas
17 leak or a building issue are the only closures --

18 Q. Okay. When --

19 A. -- to the resource center.

20 Q. Sorry. Did you have something else?

21 A. No. No. Go ahead. I'm sorry.

22 Q. When you say "building issue," would
23 that refer to issues that are longer term and might
24 lead to an extended closure?

25 A. Not necessarily. When I talk building

1 Q. Okay. So when you say that DSS staff
2 would give them the options to complete their
3 interview, does that mean that the script that call
4 center staffers are working off of includes text
5 outlining, you can complete your interview by phone
6 or you can complete your interview face-to-face?

7 A. So DSS staff, if they have them on --
8 if they have the applicant on the phone, would
9 complete the interview unless the participant
10 specifically said, "I want the interview to be
11 face-to-face." But it is -- in many of our brochures
12 and notices, it is laid out exactly that a
13 face-to-face can be requested or it can be done over
14 the phone.

15 Q. Okay. Thank you. So towards the
16 bottom of the page, the last paragraph that is not
17 bolded, I'm going to look at the final sentence which
18 says, "When transferring to the appointment line,
19 staff should inform clients appointments cannot be
20 made for the same day."

21 Do you see where I'm referring?

22 A. Yes, I see that.

23 Q. Why can't individuals get same-day
24 appointments?

25 A. Same-day appointments are not offered

1 simply for staffing resources. If an applicant or
2 participant was to walk in to a resource center and
3 request -- and did not have an appointment, staff
4 would do their best to ensure that a face-to-face
5 interview could be completed -- could be completed.

6 Q. Okay. Who made the decision to
7 disallow same-day appointments?

8 A. That would have been a decision --
9 Nichole Conway, Jason Comer -- simply to ensure that
10 we had the staffing available to handle the
11 appointments.

12 Q. Okay. Thank you.

13 We're going to introduce two more
14 exhibits that we're going to look at side-by-side
15 again.

16 MS. DEABLER-MEADOWS: So, Sara, please
17 put in 106440 as DSS_Wolf 37 and then 33892 as
18 DSS_Wolf 38.

19 (Whereupon, Deposition Exhibit DSS_Wolf
20 Numbers 37 and 38 were marked
21 for identification.)

22 BY MS. DEABLER-MEADOWS:

23 Q. And, Ms. Wolf, just let me know when
24 you have both of those open.

25 A. Did you say 37 and 38?

1 resource centers. They are there to address any of
2 the public's needs, whether it be application,
3 interview, verification or just answer general
4 questions.

5 Q. Okay. Thank you.

6 A. Uh-huh.

7 Q. Okay. I think that's it for this one.

8 Okay. How many people total work in
9 the resource centers right now?

10 A. In the resource centers currently, I
11 believe we have just over -- just under 400
12 employees. But like I stated earlier, we are always
13 trying to hire and increase our staff in the resource
14 centers.

15 Q. Okay. And I know you've already
16 covered some of this, but could you give me as
17 complete a list as you are able of the tasks that
18 staff and resource centers are expected to do.

19 A. Staff and resource centers are there
20 to assist the public, whether it be applicant or
21 participant, with applications, verifications,
22 answering general questions, additional resources,
23 registering applications, just anything that would
24 assist participants or applicants in completing their
25 case or answering general questions.

1 Q. Okay. Thank you. How many people
2 currently work in the customer service centers?

3 A. In the customer service center
4 specifically is just under 300.

5 Q. Has DSS ever generated an estimate of
6 how many people would need to be staffed on the
7 customer service center to keep the call center
8 deflection rate at zero percent?

9 A. So to keep the deflection rate at zero
10 percent, that would be hard to calculate simply
11 because demand is hard to determine, not only day by
12 day but hour by hour.

13 Q. Okay. Has DSS ever attempted to make
14 such a calculation?

15 A. We have not.

16 Q. Thank you. And could you also give me
17 as complete a list as you're able of the tasks that
18 customer center employees are expected to do?

19 A. Customer center -- customer service
20 center employees are also expected to answer general
21 questions, complete interviews, process a case after
22 the interview is complete to try to res- -- to come
23 with a resolution at the end, inform callers of
24 possible resources.

25 Q. Okay. Thank you. How many people

1 are -- total are currently staffed in the processing,
2 centers?

3 A. The processing centers, I believe is
4 right at -- I'm going to -- to be honest, I think our
5 total is right at 1800 for call centers, resource
6 centers, and processing centers, so quick math,
7 1800 -- or, I'm sorry, minus the just under 400 and
8 just under 300 for resource centers and call centers
9 respectively.

10 Q. Okay. And can you give me as complete
11 a list as you're able of the tasks that processing
12 center staff are expected to do?

13 A. Processing center staff are expected
14 to process cases to a determination, work
15 verifications, process verifications, applications,
16 answer phone calls when needed or actually assist
17 resource centers when needed also.

18 MS. DEABLER-MEADOWS: I'm going to
19 introduce another exhibit, which will be DSS_Wolf 42
20 and, Sara, that's going to be 0126881.

21 (Whereupon, Deposition Exhibit DSS_Wolf
22 Number 42 was marked for identification.)

23 BY MS. DEABLER-MEADOWS:

24 Q. Let me know when you can see that.

25 MR. HAYNES: It looks like that works

1 it. Yes.

2 Q. Okay. Do DSS staff move between
3 different public benefits programs?

4 A. Yes, DSS staff can move between
5 different programs.

6 Q. Okay. Do they do so routinely?

7 A. Yes.

8 Q. And who makes the decision to reassign
9 DSS staff to work on a different public benefits
10 program?

11 A. That would be Jason Comer.

12 Q. Okay. And then we're going to look at
13 Slide 14, which is labeled Current Assignments. Let
14 me know when you're there.

15 A. I'm on Slide 14.

16 Q. So the first bullet refers to staff
17 missions. What is a staff mission?

18 A. Staff missions are part of our
19 tasking, so that is their mission to accomplish for
20 the day. So based on our tasking system, it can be
21 labeled and I -- that's what's in that first line
22 there.

23 Q. Okay. And when you say "tasking
24 system," that's the current system that you referred
25 to earlier?

1 A. Yes.

2 Q. So are staff members assigned a new
3 mission each workday?

4 A. Not necessarily each workday. It's
5 based on the demand and the need.

6 Q. Okay. So if a staff member were being
7 moved from working on Medicaid to working on SNAP,
8 would they be informed of that change via their staff
9 mission?

10 A. Can you -- can you rephrase that,
11 please?

12 Q. Sure. If a staff member were being
13 switched from working on one public benefits program
14 to another, would that change be reflected in their
15 staff mission?

16 A. Yes.

17 Q. Okay. Would they be informed of the
18 change through any other means?

19 A. They would be -- also be informed by
20 their direct supervisor.

21 Q. Okay. And who assigns the staff
22 missions?

23 A. That's a coordination between the
24 program administrators, the supervisor, and Jason
25 Comer.

1 under Staffing Data Foot Notes.

2 A. Oh, I'm sorry. There it is. I see
3 it.

4 Q. Okay. Does this process of adding the
5 processing center staff or removing them throughout
6 the day -- and to be clear, this is referring to
7 adding and removing them from the call center -- is
8 that the same process that we were just talking about
9 in regards to staff missions and backup missions?

10 A. Yes, that would be the same.

11 Q. Okay. Are all members of the
12 processing center staff trained to do SNAP
13 interviews?

14 A. Yes, they are.

15 Q. And just in practical terms, what is
16 involved with adding a member of the processing
17 center staff to the call center partway through the
18 day? Do they have to change workstations?

19 A. No, they do not have to change
20 workstations. They can stay right where they are, as
21 far as in their workstation computer. Just would be
22 making sure to log in to the Genesys phone system so
23 that those calls can be tracked.

24 Q. Okay. Great. Thank you.

25 One other practical question about the

1 Q. Okay. Is there anyone in particular
2 at FSD who's working on that?

3 A. Allison Robeson.

4 Q. And what's her job?

5 A. She is the HR manager.

6 Q. Okay. She's the HR manager for FSD?

7 A. For FSD, yes.

8 Q. Okay. Thank you.

9 MS. DEABLER-MEADOWS: And, Sara, you
10 can stop screen sharing.

11 BY MS. DEABLER-MEADOWS:

12 Q. So aside from shifting staff around
13 between resource centers, the call center, and
14 processing centers, has DSS ever moved staff from
15 other parts of the agency to work on SNAP interviews?

16 A. We have not moved other staff to work
17 on SNAP interviews at this time.

18 Q. Okay. Has that option ever been
19 considered?

20 A. It has been considered in that FNS
21 also has very strict guidelines on who can do those
22 interviews, so we have to keep in mind there are some
23 guidelines on who can and cannot based on regular job
24 duties.

25 Q. So have there been conversations about

1 interviews.

2 Q. Is this the current training plan
3 that's used for staff who are being trained to do
4 SNAP interviews?

5 A. Actually, no, because of our revamp
6 that started, we just implemented that two weeks ago.

7 Q. Okay. So is there a new training
8 plan?

9 A. Yes, there would be a new training
10 plan.

11 MS. DEABLER-MEADOWS: Okay. That will
12 need to be produced.

13 MR. HAYNES: I'll work on that.

14 BY MS. DEABLER-MEADOWS:

15 Q. Who drafted the new SNAP training
16 plan?

17 A. We contracted with an outside
18 contractor and entity in conjunction with the
19 training unit who is managed by Jolon Wickern.

20 Q. Okay. What's the name of the outside
21 contractor?

22 A. Change & Innovation Agency.

23 Q. And is that contractor performing any
24 other work for DSS right now?

25 A. Yes.

1 Q. And what is that work?

2 A. That work includes reviewing --
3 obviously, the training plan that I just discussed.
4 It also includes reviewing our processes to ensure we
5 have the most streamlined processes available for
6 staff and participants.

7 Q. Okay. Would it be accurate to say
8 that DSS, in collaboration with that contractor, is
9 undergoing a business process redesign?

10 A. That would be accurate.

11 Q. Okay. Is that -- how long has that
12 process been going on?

13 A. That process started at the end of
14 2020.

15 Q. Okay. Is there a target end date for
16 that process?

17 A. The -- we do not have a specific
18 target end date. It is based on milestones.

19 Q. Okay. Thank you.

20 Okay. So let's look at Page 3. And
21 the second paragraph says, "As we were working on the
22 final details of this plan we were informed that you
23 will need to learn how to do SNAP Phone Interviews
24 slated to start in January 2022." And then the
25 paragraph above refers to this training being for a

1 group of staff that started together in March 2021.

2 Is that period of time from March 2021
3 to January 2022 a typical amount of time for new
4 staff to start doing SNAP interviews?

5 A. No.

6 Q. What would be a more typical amount of
7 time?

8 A. It typically takes a couple of months
9 for new staff to be trained in a way to be able to
10 complete a SNAP interview.

11 Q. Okay. Is there a reason why there was
12 a longer gap between start date and doing SNAP
13 interviews for this group?

14 A. I am not aware of what it would be.

15 Q. Who decides which staff members
16 receive this SNAP interview training?

17 A. All new employees receive SNAP
18 interview training.

19 Q. Okay. And who schedules them for that
20 training?

21 A. The training is scheduled in
22 collaboration between the training unit, which is
23 under Jolon Wickern, and the immediate supervisor --

24 Q. Okay.

25 A. -- based on available time slots in

1 Q. Okay. Thank you. How can a person
2 who wants to apply for SNAP access an application?

3 A. DSS offers multiple ways to access an
4 application, including by mail, in person, and
5 walking in from a resource center. We have several
6 community partners that also have SNAP applications
7 available. Online, those can be faxed in, mailed in,
8 dropped off. There's numerous ways.

9 Q. Does DSS have the ability to accept a
10 SNAP application over the phone?

11 A. We do not at this time.

12 Q. Was that something that you had a
13 waiver for during COVID?

14 A. No, we did not. We waived interviews
15 during COVID.

16 Q. Okay. Could an individual request a
17 SNAP application by asking on the call center?

18 A. Yes, they can.

19 Q. And once they made that request, what
20 would happen?

21 A. The eligibility worker would ensure
22 they had the correct address and mail that
23 application to the participant or applicant or they
24 would instruct that applicant or participant to go
25 online or to their local resource center. They would

1 A. That would be frontline staff, benefit
2 program technicians.

3 Q. And does that include resource center
4 workers and call center workers?

5 A. Yes.

6 Q. Does it include processing center
7 workers?

8 A. Yes.

9 Q. We're going to turn to the fifth page
10 of the document, which is Bates Stamped 0128438, and
11 we're going to look at letter f at the bottom of the
12 page. Let me know when you get there.

13 A. I'm at letter f.

14 Q. Okay. So under letter f, there are
15 references to registering applications. If a person
16 is registering a SNAP application is not at the same
17 time conducting the interview, how is that
18 application marked as received by the agency?

19 A. You cut out at the very end. Can you
20 restate your question?

21 Q. Sure. This text makes references to
22 registering applications, which I understand to mean
23 SNAP applications -- or to include SNAP applications.
24 If the worker who is registering an application is
25 not at the same time conducting an interview, how is

1 the application marked as received?

2 A. In the system, our FAMIS eligibility
3 system, there is -- there are screens for registering
4 that make -- that flag the system to say there is an
5 application registered and pending an interview.

6 Q. Okay. And now we're going to look at
7 Page 7 of this document. Let me know when you're
8 there.

9 A. Okay.

10 Q. Okay. So we're going to look at
11 Step 5, Complete the Application Registration and
12 Enter the Controlled Flow. Once an application is
13 registered in FAMIS, does that actually trigger an
14 interview process?

15 A. It would trigger that an interview
16 needed to be completed unless it was a waived
17 interview.

18 Q. What's a waived interview?

19 A. Waived interview would be an interview
20 not required currently. We have those for some of
21 our elderly and disabled population if they meet
22 certain criteria. But during COVID, we waived
23 interviews for a couple months for all interviews.

24 Q. Okay. Thank you. Those waivers
25 were -- were those waivers pursuant to an FNS COVID

1 waiver?

2 A. Yes.

3 Q. So once FAMIS has triggered that an
4 interview is needed, what happens next in the system?

5 A. The following day -- once the
6 application is registered, the following day the
7 predictive dialer picks up that application that
8 needs an interview and makes a call out to the
9 participant based on the phone number that's provided
10 so that an interview can be -- or is attempted to be
11 completed the very next day.

12 Q. Okay. Just making sure I haven't
13 missed anything before we move on. And under Step 6,
14 letter a, Number i, there's references to entries
15 relating to screening of expedite eligible.

16 Do you see where I'm referring?

17 A. Under Step 6a. I'm there.

18 Q. Okay. Is this -- these entries
19 relating to screened expedite eligible, is that the
20 same expedited screening process that we talked about
21 in relation to the predictive dialer this morning?

22 A. Yes.

23 Q. We're going to look at the next page,
24 so letter d at the top of the eighth page of this
25 document, do you see where I'm referring?

1 was available to conduct the interview at that time,
2 would that be noted in their case file?

3 A. It would not be noted in their case
4 file. But in our tasking system, each person -- or
5 each individual that -- applicant or recipient that
6 comes in, we do have a record of that.

7 Q. Okay. Thank you. When a SNAP
8 application is denied for failure to complete an
9 interview within 30 days, is that something that
10 DSS's computer system does automatically?

11 A. Yes, our FAMIS eligibility system can
12 track that based on no interview completed.

13 Q. Okay. So on day 30 after a SNAP
14 application has been filed, is it correct that FAMIS
15 would just auto deny that application?

16 A. It would auto deny, but it would be
17 overnight to allow the full business hours for that
18 interview to be completed.

19 Q. Okay. Thank you. Are there any
20 exceptions to that auto denial when the interview has
21 not been completed?

22 A. I don't know of any at this point.

23 Q. Do -- if a DSS worker knows that an
24 applicant has been trying to get interviewed and has
25 not been able to because of call center wait times,

1 available?

2 A. Yes, they will be.

3 MS. DEABLER-MEADOWS: I'm going to
4 suggest that we take a ten-minute break so you guys
5 don't have to sit here and watch me organize my
6 papers, so can we reconvene in ten minutes?

7 THE WITNESS: That's fine.

8 MR. HAYNES: Yeah.

9 THE WITNESS: Thank you.

10 MS. DEABLER-MEADOWS: Thanks.

11 (Brief recess taken.)

12 BY MS. DEABLER-MEADOWS:

13 Q. I just want to briefly move back to a
14 couple questions about the predictive dialer. What
15 time of day does the predictive dialer start calling
16 people?

17 A. I believe it starts at 7:00 a.m.

18 Q. And how long does it keep trying to
19 call people?

20 A. It goes un- -- the predictive dialer
21 runs until it goes through the entire list of
22 applications registered the previous business day.

23 Q. Okay. And if that list of
24 applications took longer than the call center
25 operations time for the day, would it continue on

1 calling from that same list the following day?

2 A. It would, but that's very rare that we
3 can't get through the list in a day.

4 Q. And is there a particular order that
5 the predictive dialer calls people in?

6 A. No.

7 Q. It's not -- it's not like the order
8 that the applications were registered?

9 A. No, it's just a list and it makes --
10 without getting too technical, the predictive dial
11 dials multiple numbers at the same time. And when
12 someone picks up, that's who -- when an applicant or
13 participant picks up the phone, that's what's routed,
14 and it continues to call other numbers.

15 Q. And are there any points during the
16 day when the predictive dialer is paused?

17 A. No.

18 Q. Okay. So if I remember correctly,
19 earlier today you testified that when individuals are
20 called via the predictive dialer, if they answer the
21 call, they are not placed in the call center queue;
22 is that correct?

23 A. That is correct.

24 Q. Okay. We're going to look at a
25 document.

1 MS. DEABLER-MEADOWS: Okay. And what
2 number was that?

3 MS. LUNDEN: It was DSS_Wolf 32.

4 MS. DEABLER-MEADOWS: Okay. Let's
5 open Exhibit 32.

6 BY MS. DEABLER-MEADOWS:

7 Q. And let me know when you have that
8 open.

9 A. I have that open.

10 Q. Okay. So if we're looking at Page 3,
11 first it says the FSD Languages Menu. I believe
12 that's the language selection that you were just
13 describing a moment ago; is that correct?

14 A. That's correct.

15 Q. And then an individual trying to
16 navigate to the SNAP flow would press 1; correct?

17 A. That's correct.

18 Q. Okay. And then under SNAP flow, this
19 is the identity verification; correct?

20 A. Yes.

21 Q. So then if we're looking at "Pending
22 Cases - need interview," there's text that says, "Our
23 records show that you need to complete an interview
24 before we can process your SNAP application. If you
25 would like to complete this interview now, press 1.

1 To complete this application at another time, you may
2 call the application interview line directly at 855
3 823 4908."

4 Is that the phone number to your
5 Tier 3 call center?

6 A. Yes, I believe so. I don't remember
7 all the 800 numbers by heart.

8 Q. Okay. So I guess what I'm looking to
9 clarify is at what point in this flow is the
10 appointment scheduler offered?

11 A. Give me a second to review, please.
12 The appointment scheduler was just implemented in
13 March of '23, the most up-to-date one.

14 Q. So does that option now appear on this
15 version of the IVR flow?

16 A. It appears it does not -- is not
17 included in this version.

18 MS. DEABLER-MEADOWS: Okay. So we'll
19 need a supplemental production that includes that
20 updated IVR flow that does reflect the appointment
21 scheduler.

22 MR. HAYNES: If it exists and hasn't
23 been produced, then I would certainly not disagree
24 with you.

25 MS. DEABLER-MEADOWS: Okay. Thank